

Tommy Navarrette (Pro-Se)
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(Plaintiff Pro-Se)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TOMMY NAVARRETTE
Plaintiff,
vs.
Options Recovery Services,
Pamela Thomas, Brianna Herron,
George K.L. Smith
Defendants

Case No. 3:22-cv-02156-MMC

PLAINTIFF'S REQUEST FOR EXTENSION
OF TIME TO RESPOND TO DEFENDANTS
MOTION TO DISMISS

HEARING DATE: October 7, 2022

TIME: 9:00 a.m.

COURTROOM: 7

JUDGE: Hon. Maxine M. Chesney

COMES NOW plaintiff in the above caption matter hereby
Plaintiff respectfully moves the court for an order extending his
09/16/2022 deadline to file with this court, and serve on
defendant an opposition to defendant's "**MOTION TO DISMISS**
PLAINTIFF'S FIRST AMENDED COMPLAINT [FRCP 12(b)(6)]

1. The Response to Defendants Motion to dismiss is currently scheduled for Friday, September 16th, 2022, 5 days from today.
2. I respectfully request that the Court move the Plaintiff's response to Monday, October 17th, 2022 or another date at the Court's convenience to allow Plaintiff the opportunity to consult with the FedPro Legal consultation team and properly prepare a response.
3. Plaintiff has not asked for an extension on a response previously.

4. This change in date will not affect future dates as the Case Management Conference is set for December 2, 2022.

5. This change is necessary due to;

A. Plaintiff is pro-se and is unfamiliar with how to respond.

B. Plaintiff has tried to make an appointment with FedPro consultation but has not secured a date as of today.

6. The Defense replied to Plaintiff's request for consent via email on Friday, September 9th, 2022 by stating the following, "Mr. T Navarrette EL, It is my belief that you must seek permission from the Court. We will certainly abide by our Judge's decision regarding your request for an extension.

Sincerely, Richard S. Linkert, Partner"

I declare under penalty of perjury that the above statements are true and correct.

Respectfully submitted,



Date: 9.11.2022

Tommy Navarrette

Pro-se

Good cause appearing, the motion is GRANTED. Defendants response is rescheduled to Monday, October 17th, 2022 at 9:00 a.m.

IT IS SO ORDERED.

Date: _____

[For Judge] _____

Honorable Judge Maxine
M Chesney United States
District Judge